

Message

From: TU, LYNDSEY [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1BBD1651E4434BD78233A6BC426D56F1-TU, LYNDSEY]
Sent: 4/3/2018 2:54:20 PM
To: Grange, Gabrielle Fenix [Gabrielle.Grange@doh.hawaii.gov]
Subject: RE: Follow up email to Tracy

Thanks Fenix,

I am available during that timeframe. Give me a call when you have a chance.

From: Grange, Gabrielle Fenix [mailto:Gabrielle.Grange@doh.hawaii.gov]
Sent: Monday, April 02, 2018 8:08 PM
To: TU, LYNDSEY <Tu.Lyndsey@epa.gov>
Cc: Ichinotsubo, Lene K <lene.ichinotsubo@doh.hawaii.gov>
Subject: RE: Follow up email to Tracy

Thanks, Lyndsey,

Sorry I missed our regulator's call this morning. Thanks for putting this together and working to move out tech discussions with the Navy forward given the looming Tech Memo completion in early May.

Tried calling you when I got back after yet another hearing, but by then it was too late in the day your time. To gather my thoughts, I made some quick notes in yellow below and would like to hear your thinking and talk with you in the morning about how to best align our priorities. I am free from 8-10 tomorrow am, so we can talk any time before the AOC call.

Fenix

From: TU, LYNDSEY [mailto:Tu.Lyndsey@epa.gov]
Sent: Monday, April 2, 2018 12:45 PM
To: Grange, Gabrielle Fenix <Gabrielle.Grange@doh.hawaii.gov>
Cc: Ichinotsubo, Lene K <lene.ichinotsubo@doh.hawaii.gov>
Subject: Follow up email to Tracy

Hi Fenix,

We discussed this on Thursday, but this is the follow up email I was planning to send to Tracy. Tracy and I had a quick chat today to clarify meeting content and schedule for the upcoming meeting and she is expecting this email. We are looking now at the last week of April for meetings- as scheduling for Gary, Matt and the Navy is not possible before then. I'll try to catch you this afternoon or tomorrow to discuss my call with Tracy in greater detail.

Once you've had a chance to look it over me know if you concur, and I will send on.

Thanks.

Lyndsey Tu
Underground Storage Tanks Program
Land Division, U.S. EPA Pacific Southwest
Tu.Lyndsey@epa.gov | 415-972-3269

Hi Tracy,

Thank you for the call today, I anticipate that we will be able to achieve our intended goals with one meeting in late April/ Early May. I'm concerned this is too close to their release date for the TM and would like to get our bottom line concerns to them about the water chemistry interpretation sooner, and ideally, talk with Ileana, even if it is a short focused call without slides. That flows into the fundamental issue with the LNAPL model. If that's just not possible, summarizing our internal team discussions that there are other equally or more plausible interpretations of the data indicating gw impacts have already happened, and transport appears to be occurring at greater distances than can be explained by their box model.

Per our discussion, the Regulatory Agencies require additional information to support an understanding of the basis for the geologic model in Navy's CSM prior to the release of the technical memo. The specific information used in the base geologic model (i.e. dip angles, apertures, lava flow directions, etc.) should be made available to the Regulatory Agencies by April 16th. We request this data be made available to us in easily accessible electronic form and plan to share it with external subject matter experts upon being made available us if the Navy does not. Our experts feel that this information is vital to adequately and objectively judge the Navy's models. We are available for discussion should you feel that April 16th is too soon, but we feel strongly that this data is a priority. Similarly, to effectively evaluate the gw model, having access now to integrated data files that we can use to map and create data layers is essential. The DVD files are all separate and would require a lot of effort to reassemble into a useable picture.

In addition, I discussed providing some thoughts regarding the EV Tech Memo as it relates to the TUA decision. Overall, the interim environmental information is intended to support a tank upgrade decision, and we believe the environmental information to date should be used to provide answers to questions such as the ones below, on a local and regional scale under normal conditions.

- What happens to small (below detection limit) Chronic releases, and where do they go in the environment?
- What happened to the Tank 5 release?
- If another release of a similar magnitude was to occur from a different tank, what type of environmental response could the Navy have given the information available and monitoring well network?
- What about a release of hundreds of thousands of gallons?
- Can the Navy predict concentrations at Navy wells and at Red Hill shaft in a release scenario under normal pumping conditions?

I understand that the Navy is working to include additional release scenarios in the tech memo, we look forward to discussing those scenarios as well as the questions we've raised in a future call.

In preparation for our upcoming meetings regarding components of the Navy's CSM, we wanted to make clear our priorities for discussion.

Using the 'modules' laid out by the CSM table of contents shared at a previous Technical Working Group meeting, our priorities for discussion, and follow up questions are:

Module C- LNAPL Model

Lyndsey, resolving the 5 points laid out by G.D, about water chemistry interpretation is key to moving forward on the LNAPL model

- Provide a detailed description of the changes to their LNAPL conceptual model given recent discussions

-Discussion of the release scenarios

Module F- Dissolved Phase Transport

-Priority discussion topic, as it applies to the questions above. This is important, but requires agreement and discussion on the GW flow model, another area where we may be nearing an impasse.

Module D- Vadose Zone /Geologic Model

- What progress if any has been made regarding previous suggestion to examine changes in features across barrel logs? Bob and Don want these data to work themselves - how do we get that?

Please feel free to reach out if there is any need for further clarification. Otherwise we look forward to having the opportunity to comment on an agenda as soon as one is available.

Thanks,

Lyndsey Tu
Underground Storage Tanks Program
Land Division, U.S. EPA Pacific Southwest
Tu.Lyndsey@epa.gov | 415-972-3269